

**UNITED STATES BANKRUPTCY COURT FOR THE  
DISTRICT OF MARYLAND  
Baltimore Division**

*In re:* \* Case No. 25-184-ELG  
*Swain Landing LaPlata JC, LLC* \* U.S. Bankruptcy Court for the District of  
 \* Columbia

## Debtor

\* \* \* \* \*

Claudia Engelhorn, et al.

## Plaintiffs

v.

Erik D. Bolog, et al.

## Defendants

\*\*\*\*\*

### **JOINT STIPULATION REGARDING EXTENSION OF RESPONSE DEADLINE**

Plaintiffs and Counter-Defendants, Claudia Engelhorn (“Ms. Engelhorn”), individually and as Trustee of the Whitewater Revocable Trust dated September 30, 2021, as amended, (“Whitewater Trust”) and White Pearl, LLC (“White Pearl”) and, collectively, “Plaintiffs”) and above-captioned debtor Swain Landing LaPlata JC, LLC (the “Debtor” and, together with the Plaintiffs, the “Parties”), submit this joint stipulation extending Debtor’s time to file a response to the *Motion for Remand and Abstention to the State Court* [Adv. Pro. Dkt. No. 43] (the “Motion for Remand”).

Plaintiffs and Debtor each agree to extend the Debtor's deadline to respond to the Motion for Remand to July 31, 2025.

Nothing contained herein shall be construed to prohibit the Parties from requesting or agreeing to additional extensions.

Date: July 23, 2025

/s/ Maurice B. VerStandig (with consent)  
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*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of July, 2025, a copy of the foregoing was served electronically upon filing via the ECF system, with copies being sent to all parties receiving electronic notice herein.

/s/ Sam J. Alberts

Sam J. Alberts